BEFORE THE MEDICAL BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA	
In the Matter of the Case Against:)
Steven Theodore Raheb, M.D. 340 Pomfret Street Putnam, CT 06260	MBC Case No. 800-2017-036810
Physician's and Surgeon's Certificate No. G62726	
Respondent.	
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<u>DECISION AN</u>	<u>ID ORDER</u>
The surrender of Physician's and Su	
Respondent, Steven Theodore Raheb M.D., is acce	pted by the Medical Board of California,
Department of Consumer Affairs.	
This Decision shall become effective	e at 5:00 p.m. on the $\frac{28 \text{ th}}{}$ day of
<u>December</u> , 20 <u>17</u> .	
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Ordered December 28, 2017	
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BEFORE THE MEDICAL BOARD OF CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of the Case Against:) MBC Case No. 800-2017-036810
Steven Theodore Raheb, M.D. 340 Pomfret Street Putnam, CT 06260	STIPULATION FOR SURRENDER OF LICENSE
Physician's and Surgeon's Certificate No. G62726	
Respondent.	}

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled proceedings, that the following matters are true:

- 1. Complainant, Kimberly Kirchmeyer, is the Executive Director of the Medical Board of California, Department of Consumer Affairs ("Board").
- 2. Steven Theodore Raheb, M.D. ("Respondent") has carefully read and fully understands the effect of this Stipulation.
- 3. Respondent agrees that based on the action taken by the Connecticut Medical Examining Board, (Exhibit A) cause exists to discipline his California Physician's and Surgeon's certificate pursuant to Business and Professions Code sections 141(a) and 2305.
- 4. Respondent understands that, if proven at hearing, the charges and allegations under investigation would constitute cause for imposing discipline upon Respondent's license issued by the Board.
- 5. Respondent is aware of each of his rights, including the right to a hearing, the right to confront and cross-examine witnesses who would testify against Respondent, the right to testify and present evidence on his own behalf, as well as to the issuance of subpoenas to compel the attendance of witnesses and the production of documents, the right to contest any

charges and allegations, and other rights which are accorded Respondent pursuant to the California Administrative Procedure Act (Gov. Code, §11500 et seq.) and other applicable laws, including the right to seek reconsideration, review by the superior court, and appellate review.

- 6. In order to avoid the expense and uncertainty of a hearing, Respondent freely and voluntarily waives each and every one of these rights set forth above. Respondent hereby agrees to surrender Physician's and Surgeon's Certificate No. G62726.
- 7. Respondent understands that by signing this Stipulation he is enabling the Board to accept the surrender of his license without further process, as provided by section 11415.60(b) of the Government Code.
- 8. Upon acceptance of the Stipulation by the Board, Respondent understands that he will no longer be permitted to practice as a Physician and Surgeon in California, and also agrees to surrender and cause to be delivered to the Board both his license and wallet certificate before the effective date of the Decision.
- 9. Respondent hereby represents that he does not intend to seek relicensure or reinstatement as a Physician and Surgeon. Respondent fully understands and agrees, however, that if Respondent ever files an application for relicensure or reinstatement in the State of California, the Board shall treat it as a Petition for Reinstatement, and the Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the Petition is filed. Case Report No. 800-2017-036810, including all referenced attachments and other exhibits, and any additional attachments, and other exhibits, that may be generated subsequent to the filing of the surrender of license, shall be admissible as direct evidence, and any time based defenses, such as laches or any applicable statute of limitations, shall be waived when the Board determines whether to grant or deny the Petition.
- 10. Respondent understands that this document may be disclosed to the public, and/or the National Practitioner Data Bank and/or the Federation of State Medical Boards.

ACCEPTANCE

I, Steven Theodore Raheb, M.D., have carefully read the above Stipulation and enter into it freely and voluntarily, with the full knowledge of its force and effect, do hereby surrender Physician's and Surgeon's Certificate No. G62726, to the Medical Board of California. By signing this Stipulation for Surrender of License, I recognize that upon its formal acceptance by the Board, I will lose all rights and privileges to practice as a Physician and Surgeon in the State of California, and I also will cause to be delivered to the Board both my license and wallet certificate before the effective date of the Decision.

DATED: 15 Dec 17

Steven Theodore Raheb, M.D.

Respondent

DATED: 15 Dec. 17

WITNESS

STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH HEALTHCARE QUALITY AND SAFETY BRANCH

Re: Steven T. Raheb, MD

Petition No. 2017-587

License No.: 1.029642

VOLUNTARY SURRENDER

Steven T. Raheb, MD, being duly sworn, deposes and says:

- 1 I am over the age of majority and understand the obligations of an oath.
- 2 I make this affidavit on the basis of personal knowledge.
- I am licensed by the Department of Public Health (hereinafter "the Department") to practice as a physician/surgeon. I presently hold license number 1.029642.
- 4 I hereby voluntarily surrender my license to practice as a physician/surgeon in the State of Connecticut as provided pursuant to Section 19a-17(d) of the General Statutes.
- 5. While admitting no guilt or wrongdoing, I understand and agree that if I seek a new license or to reinstate my license at any time in the future, the allegations contained in Petition Number 2017-587 shall not be contested. I further understand that any such application must be made to the Department which shall have discretion as to whether said license shall be issued or reinstated and, if so, whether said license shall be subject to conditions as provided pursuant to Section 19a-14(a)(6) of the General Statutes.
- 6. I hereby waive any right to a hearing I may have regarding any request that my license be reinstated or that a new license be issued and also waive any right that I may have to appeal or otherwise challenge the disposition of any such request.
- By letter dated July 5, 2017, I have submitted my response to the allegations through my counsel and I understand and agree that this affidavit and the case file in Petition Number 2017-587 are public documents, and I am executing this affidavit in settlement of the allegations contained in the above-referenced petition since I am leaving the practice of medicine.
- 8. I understand that this surrender of agreement of my license is an event that is reportable to the National Practitioner Data Bank and the Healthcare Integrity and Protection Data Bank maintained by the United States Department of Health and Human Services and will appear on my physician profile pursuant to Connecticut General Statutes 20-13j, and is public information.

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- 9. Within ten days of the Department's execution of this document, I agree to surrender my state and federal Controlled Substance Registrations to the issuing authorities.
- 10. I understand that this document has no effect unless and until it is executed by the Department; and that, upon execution, the Department will dismiss Petition No. 2017-587.
- 11. I understand that I have the right to consult with an attorney prior to signing this affidavit.
- 12. I understand that the execution of this document has no bearing on any criminal liability without the written consent of the Director of the Medicaid Fraud Control Unit or the Bureau Chief of the Division of Criminal Justice's Statewide Prosecution Bureau.
- 13. I understand that the purpose of this agreement is to resolve the pending matter against my license and is not intended to affect any claim of civil liability that might be brought against me
- 14. If applicable, I agree to comply with the provision of Section 19a-14-44 Regulations Connecticut State Agencies.

Steven T. Raheb, MD

Subscribed and sworn to before me this 13th day of July 2017.

Notary Public Commissioner of Superior Court

Notary Public Commissioner of Superior Court

Notary Public Commissioner of Superior Court

Accepted: Kather Bullian RW PHSiM

Christian D. Andresen, Section Chief Kathleen Bouleane RDate

Practitioner Licensing and Investigations Public Health Scales Manager

Healthcare Quality and Safety Branch